

**UNITED STATES DISTRICT COURT  
FOR THE Northern District of Illinois  
Eastern Division**

Helen Herron,

Plaintiff,

v.

Walmart Inc.,

Defendant.

Case No.:

**COMPLAINT**

NOW COMES the Plaintiff, **Helen Herron** by and through her attorneys, **THE LAW OFFICES OF McCREADY, GARCIA & LEET, P.C.**, and in her first complaint against the Defendant, **Walmart Inc.**:

**PARTIES**

1. Plaintiff, Helen Herron (“Plaintiff”) was at all times relevant to this Complaint a citizen of Matteson, Illinois.
2. Defendant Walmart Inc. is a Delaware Corporation with its principal place of business in Bentonville, Arkansas.

**JURISDICTION & VENUE**

1. The amount requested by the Plaintiff exceeds \$75,000.00.
2. Jurisdiction of this Court is provided by 28 U.S.C. Section 1332 due to the diversity of citizenship of the Plaintiff and Defendant and the amount request exceeding \$75,000.00.
3. Venue is proper in this judicial district under 28 U.S.C. Section 1391(a) because Plaintiff resides in the District, Defendant conducts business in the District, and all events giving rise to Plaintiff’s claims occurred within this District.

**Herron vs. Walmart Inc.**

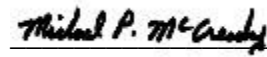
- 1) On or about August 2, 2020, Plaintiff was lawfully on the premises of Defendant Walmart Inc., located at 21000 Western Ave, Olympia Fields, Illinois 60461.
- 2) At all times relevant to this Complaint., Defendant Walmart Inc. owned/maintained/controlled and/or operated the above property.
- 3) Plaintiff was exercising reasonable care for her safety and was free from contributory negligence.
- 4) At all times pertinent, it was the duty of the Defendant Walmart Inc. to maintain its premise in a reasonably safe condition.
- 5) Defendant breached this duty and was negligent in one or more of the following ways:
  - a) Caused the floor to have an unsafe liquid present, posing an unsafe condition to invitees;
  - b) Allowed the floor in the walkway to remain in an unsafe condition when they knew or should have known that the liquid was present which created a hazardous condition for all individuals lawfully in the area;
  - c) Failed to maintain premise in a reasonably safe condition;
  - d) Failed to adequately inspect the premises to ensure that it was safe for the Plaintiff;
  - e) Failed to remove the liquid from the floor to provide a safe place for business invitees;
  - f) Failed to barricade the liquid to prevent Plaintiff from walking through it;
  - g) Failed to instruct employees/agents to properly remove the liquid from the floor of the above premises;
  - h) Was otherwise careless and/or negligent.
- 6) As a result of the negligence of Defendant, Plaintiff suffered injuries of a personal and pecuniary nature.

WHEREFORE, Plaintiff, Helen Herron, prays for damages in an amount greater than

\$75,000.00 as she shall prove at trial plus costs and any other relief the Court deems just or equitable.

Helen Herron

By:



Michael P. McCready  
*Counsel for Plaintiff*

McCready, Garcia & Leet, P.C.  
111 West Washington Street, Suite 1760  
Chicago, IL 60602  
t: (773) 779-9885  
f: (773) 373-2375  
[service@mccreadylaw.com](mailto:service@mccreadylaw.com)